

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

DRAFT

Conditional Major, Operating

Permit: F-07-031

T. RAD North America, Inc.

Hopkinsville, KY 42241-2300

May 7, 2007

Rita Arguello, Reviewer

SOURCE ID: 21-047-00067

SOURCE A.I. #: 757

ACTIVITY ID: APE20060001

SOURCE DESCRIPTION:

T. RAD North America, Inc. produces industrial radiators at the Hopkinsville, Kentucky facility. The plant consists of several soldering and fluxing tanks, two welding stations, and painting facilities. The paint booths are the major VOC emitters for the facility.

COMMENTS (RENEWAL):

T. RAD North America, Inc. submitted a request for a name change, formerly CoPAR, Inc. T. RAD North America is planning to increase the product line by adding production processes to manufacture a new radiator product, IMRM, in 2008, but requested not to include the production increase at this time.

The only change made to this renewal is that a new source-wide VOCs emission limit has been given to T.RAD. The new limit is 90 tons per year instead of 95 tons per year.

COMMENTS (REVISION 1):

Permit revision incorporated several changes:

- 1) Emission point 01(F), 02 (A), 04(C), 06(E), 07(G), 08(H), 09 (I), 12 (M), 13(N), 14(O), 15 (P), 18 (S), and 20(U):
Revised calculation shows that these emission points qualify as Insignificant Activities.
- 2) Emission point 10(K):
 - a. Primer is not used.
 - b. Maximum paint usage increased from 20,000 gals/yr to 30,300 gals/yr.
 - c. No change in touchup paint maximum usage (gals/yr).
 - d. Maximum cleanup solvent usage (mineral spirit) increased from 270 gals/yr to 420 gals/yr.
 - e. Type of applicator = Airless
- 3) Emission point 19(T):
 - a. Primer is not used.
 - b. Maximum paint usage decreased from 20,300 gals/yr to 10,500 gals/yr.
 - c. Maximum cleanup solvent usage (mineral spirit) decreased from 250 gals/yr to 110 gals/yr.
 - d. Type of applicator = Airless

- 4) Compliance demonstration method for VOC has been altered to reflect the modification requested.
- 5) Compliance demonstration method for HAPs has been added.
- 6) Boiler (2 mmBTU/hr) in the old permit has been replaced by electric water heating system.

EMISSION AND OPERATING CAPS DESCRIPTION:

T. RAD North America, Inc. must maintain their plant-wide VOC emissions at or below 90 tons per year, HAPs emissions shall not exceed 9 tons/year individually and 22.5 tons/year combined based on a 12 month rolling total to preclude major source thresholds under 401 KAR 52:030, Federally Enforceable permits for non-major sources.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.